

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ALI AL-TIMIMI,

Defendant.

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CRIMINAL NO. 1:04-cr-385

Consent Motion to Modify Protective Order

On June 25, 2020, the Court entered a protective order governing the dissemination of certain materials filed under seal in this case. The Order restricts the purposes for which the parties may use those materials. More specifically, paragraph 3 of the Order states:

The United States and defense counsel may use the Protected Materials for purposes of litigating the defendant's ongoing Emergency Motion for Release under the Bail Reform Act (ECF No. 465), and may make such further disclosures as may be necessary for the *sole purpose of opposing or supporting this motion*.

(ECF No. 494 ¶ 3 (emphasis added).)

In its notice of withdrawal of certain arguments relating to those under-seal materials (ECF No. 505), the government stated that it “intends to move the Court to modify the protective order ... so that the components within the Department of Justice responsible for imposing SAMs may consider the defendant’s under-seal filing.”

(*Id.* at 4.) Accordingly, the government hereby moves to amend the Protective Order to accomplish that purpose. A proposed order is attached.

The government has consulted with defense counsel, who have no objection to this motion.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: _____ /s/

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